

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,	§ § § <i>Plaintiffs,</i>
v.	§ Consolidated Case No. 5:21-CV-0844-XR
THE STATE OF TEXAS, et al.,	§ § <i>Defendants.</i>
	§ §

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***LUPE, OCA-GREATER HOUSTON, HAUL, LULAC, AND MI FAMILIA VOTA  
PLAINTIFFS' FOURTH SUPPLEMENTAL RULE 26(a)(1) INITIAL DISCLOSURES***

Pursuant to Federal Rule of Procedure 26(a)(1), and the Court's November 18, 2021 Order, ECF NO. 125, the Consolidated Plaintiffs ("Plaintiffs") make the following supplemental disclosures:

**I. Fourth Supplemental Initial Disclosure Qualifications**

These supplemental disclosures are made upon information presently known to Plaintiffs and without prejudice to Plaintiffs' right to produce during discovery or at trial such data, information or documents as are: (a) subsequently discovered; (b) subsequently determined to be relevant for any purpose; or (c) subsequently determined to have been omitted from this and any supplemental disclosure statements. By making these disclosures, Plaintiffs do not represent that they are identifying every document, tangible thing, or witness that may be relevant to the issues in this lawsuit, or on which Plaintiffs may rely in support of their claims or defenses. Nor do Plaintiffs waive their rights to object to the disclosure of any person, document, or thing on the basis of any applicable privilege, the work product doctrine, relevancy, competency, materiality, undue burden, hearsay, or any other valid objection in response to any discovery request or

proceeding in this case. Further, Plaintiffs reserve all rights to present at trial or other hearing in this matter additional witnesses and evidence not presently identified or encompassed by these disclosures, and to present any rebuttal or impeachment evidence they deem appropriate.

## **II. Fourth Supplemental Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)**

- A. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P.**

In addition to the persons identified in Plaintiffs' previous disclosures, the following individuals are likely to have discoverable information that Plaintiffs may use to support their claims and/or defenses, not including information to be used solely for impeachment.

### **1. Remi Garza, Cameron County Elections Administrator**

Mr. Garza may be contacted through his attorney of record, Daniel N. Lopez, Litigation Counsel, Cameron County Commissioner's Court, Civil Legal Division, 1100 E. Monroe St. Brownsville, Texas, 78250. Mr. Garza is likely to have knowledge of facts related to the passage, implementation, and effects of SB1, and voter registration, election administration, and voting history in Cameron County.

### **2. Luis Perales**

Mr. Perales may be contacted through the Mexican American Legal Defense and Educational Fund, 110 Broadway, Ste. 300, San Antonio, Texas 78205. Mr. Perales has knowledge of the facts related to the impact of SB1 on his voting by mail.

### **3. Esmeralda Perales**

Ms. Perales may be contacted through the Mexican American Legal Defense and Educational Fund, 110 Broadway, Ste. 300, San Antonio, Texas 78205. Ms. Perales has knowledge of the facts regarding the impact of SB1 on voters who seek to cast ballots by mail.

#### **4. Cris Rocha**

Ms. Rocha may be contacted through the Mexican American Legal Defense and Educational Fund, 110 Broadway, Ste. 300, San Antonio, Texas 78205. Ms. Rocha has knowledge of the facts regarding the impact of SB1 on voters who need assistance with voting.

#### **5. Jeanette Longoria**

Ms. Longoria may be contacted through the Mexican American Legal Defense and Educational Fund, 110 Broadway, Ste. 300, San Antonio, Texas 78205. Ms. Longoria has knowledge of the facts regarding the impact of SB1 on voters who need assistance with voting.

#### **6. Paulita Sanchez**

Ms. Sanchez may be contacted through the Mexican American Legal Defense and Educational Fund. Ms. Sanchez has knowledge of the facts related to the impact of SB1 on her voting with assistance.

- B. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(ii))**

Plaintiffs make no supplements to the First Amended Initial Disclosures with respect to the documents in their possession, custody, or control.

Dated May 11, 2022

Respectfully submitted,

*/s/ Nina Perales*

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## **CERTIFICATE OF SERVICE**

I hereby certify that on May 11, 2022, the foregoing document was served via e-mail to all counsel of record.

*/s/ Julia Longoria*  
Julia Longoria